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OCT 2 1 2002

PSEG Nuclear LLC

LR-N02-0334
LCR S02-02

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

**SUPPLEMENT TO LICENSE CHANGE REQUEST S02-02
REGARDING MISSED SURVEILLANCE REQUIREMENTS AND ADOPTION
OF TS BASES CONTROL PROGRAM USING CLIIP**

**SALEM GENERATING STATION
DOCKET NOS. 50-272 AND 50-311
FACILITY OPERATING LICENSE NOS. DPR-70 AND DPR-75**

Reference: Letter LR-N02-0227, *Request For Change to Technical Specifications Regarding Missed Surveillance Requirements (T.S. 4.0.3) and Adoption of TS Bases Control Program (T.S. 6.5) Using CLIIP*, dated July 25, 2002.

Gentlemen:

PSEG Nuclear, LLC (PSEG) hereby transmits a supplement to the referenced request for amendment of the Technical Specifications (TS) and supporting Bases for Salem Generating Station Units 1 and 2, pursuant to the requirements of 10CFR50.90.

License Change Request (LCR) S02-02 proposed an amendment to TS requirements for missed surveillance tests and adoption of a TS Bases Control Program using the Consolidated Line Item Improvement Process (CLIIP). Based upon discussion with the NRC Project Manager, further changes were identified since Salem has not adopted the Standard Technical Specifications for Westinghouse Plants (STS), NUREG-1431.

This supplemental submittal revises Specification 4.0.1 and the corresponding Bases consistent with the requirements of STS, which will ensure that provisions currently located under TS 4.0.3 are retained. The markup of page 3/4 0-2 incorporates and supercedes the previously submitted changes to Specification 4.0.3 for clarity. The remaining TS and Bases changes from the original letter

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remain valid. In addition, this supplement provides an updated No Significant Hazards Consideration for adoption of a Technical Specification Bases Control Program, which the CLIIP did not address.

Pursuant to 10CFR50.91(a)(1), PSEG Nuclear LLC has determined that this supplemental amendment involves no significant hazards considerations. The proposed supplement satisfies the criteria of 10CFR51.22 (c)(9) for categorical exclusion from the requirement for an environmental assessment.

Attachment 1 provides a description of the additional proposed changes and the supporting evaluations. Attachment 2 provides the marked up TS and Bases pages. This supplemental submittal contains no commitments.

The Station Operations Review Committee (SORC) and the Nuclear Review Board (NRB) have reviewed this proposed supplemental request for amendment. Pursuant to the requirements of 10 CFR 50.91(b)(1), a copy has been sent to the State of New Jersey.

Should you have any questions, please contact Carl Berger at (856) 339-1432.

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

10/18/02
Executed on

David F. Garchow
Vice President – Operations

Attachment 1: Description and Assessment
Attachment 2: Salem Marked-up TS Pages
Attachment 3: Proposed Changes to TS Bases Pages

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SALEM GENERATING STATION
DOCKET NOS. 50-272 AND 50-311
SUPPLEMENTAL INFORMATION REGARDING
MISSED SURVEILLANCE AND TS BASES CONTROL PROGRAM

DESCRIPTION

License Change Request (LCR) S02-02 proposed an amendment to TS requirements for missed surveillance tests and adoption of a TS Bases Control Program using the Consolidated Line Item Improvement Process (CLIIP). This supplemental submittal proposes further changes to technical specification Surveillance Requirement 4.0.1 regarding performance of surveillances by relocating provisions from the existing TS 4.0.3 and incorporating the remaining requirements of STS.

PSEG is incorporating the STS language to replace Specification 4.0.1 and supporting Bases in their entirety. Only one new requirement will result from adoption of the STS, specifically that "failure to meet a Surveillance . . . shall be failure to meet the LCO." The other three requirements are already contained in the current Specification 4.0.1 or 4.0.3. There are no substantive differences in meaning or intent between the existing specifications and the corresponding STS requirements.

These additional changes are necessary since Salem has not adopted the Standard Technical Specifications for Westinghouse Plants (STS), NUREG-1431. The changes remain consistent with the Industry Technical Specification Task Force (TSTF) change on missed surveillances,TSTF-358, Revision 6, approved by the NRC on October 3, 2001.

The original submittal proposed incorporation of a TS Bases Control Program, consistent with the program described in STS. Although use of the Consolidated Line Item Improvement Process (CLIIP) to modify the specification governing missed surveillances is predicated on concurrent adoption of a Bases control program, if not already incorporated in the TS, TSTF-358 does not provide complete justification for this aspect of the proposed change. As such, the Determination of No Significant Hazards Considerations is being modified to address the previously proposed addition of a Technical Specification Bases Control Program. In addition, the complete text of the original determination, which was incorporated into our original submittal by reference, is included directly in this supplement.

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Determination of No Significant Hazards Considerations

The referenced No Significant Hazards Consideration determination published in the Federal Register as part of CLIIP, as updated in NRC-approved TSTF-358, Rev. 6, is included here. The determination also addresses the proposed additional modification to Technical Specification 4.0.1 and incorporation of a Technical Specification Bases Control Program in section 6.0. The updated and supplemented Determination of No Significant Hazards Considerations, as presented herein, satisfies the requirements of 10CFR50.91(a).

In accordance with the criteria set forth in 10 CFR 50.92, PSEG has evaluated these proposed Improved Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. **Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?**

Specification 4.0.3
The proposed change relaxes the time allowed to perform a missed Surveillance. The time between Surveillances is not an initiator to any accident previously evaluated. Consequently, the probability of an accident previously evaluated is not significantly increased. The equipment being tested is still required to be OPERABLE and capable of performing the accident mitigation functions assumed in the accident analysis. As a result, the consequences of any accident previously evaluated are not significantly affected.

Specification 4.0.1
The proposed additional requirement equating failure to meet a surveillance with failure to meet the LCO is consistent with current interpretation of the technical specifications. This change, along with relocation and rewording of existing requirements from Specification 4.0.3, are administrative in nature and do not adversely affect accident initiators, design functions, facility configuration or the manner of operation or control. The ability of structures, systems and components to perform their intended function remains unaffected.

Bases Control Program
The proposed change to adopt a Technical Specification Bases Control Program is also administrative in nature and does not adversely affect accident initiators, design functions, facility configuration or the manner of operation or control. The ability of structures, systems or components to perform their intended function

remains unaffected. Future changes to the TS Bases will continue to be administratively controlled in accordance with the requirements of 10CFR50.59.

Therefore, these three changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

None of the three proposed changes involves a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Thus, these changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in a margin of safety?

Specification 4.0.3
The relaxed time allowed to perform a missed Surveillance does not result in a significant reduction in the margin of safety. As supported by the historical data, the likely outcome of any Surveillance is verification that the LCO is met. Failure to perform a Surveillance within the prescribed Frequency does not cause equipment to become inoperable. The only effect of the additional time allowed to perform a missed Surveillance on the margin of safety is the extension of the time until inoperable equipment is discovered to be inoperable by the missed Surveillance. However, given the rare occurrence of inoperable equipment, and the rare occurrence of a missed Surveillance, a missed Surveillance on inoperable equipment would be very unlikely. This must be balanced against the real risk of manipulating the plant equipment or condition to perform the missed Surveillance. In addition, parallel trains and alternate equipment are typically available to perform the safety function of the equipment not tested.

Specification 4.0.1
The proposed changes to TS 4.0.1, including relocation and rewording of existing requirements from Specification 4.0.3, are administrative in nature and do not reduce the level of programmatic or procedural controls associated with the Surveillance Requirements. There are no substantive differences in meaning or intent between the existing specifications and the corresponding STS requirements. Further, these changes have no impact on equipment design, configuration, analytical basis, setpoints or operation.

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Bases Control Program

The proposed change to adopt a Technical Specification Bases Control Program is also administrative in nature and does not reduce the level of programmatic or procedural controls associated with the Bases. There is no impact on equipment design, configuration, analytical basis, setpoints or operation.

Thus, there is confidence that the equipment can perform its assumed safety function. Therefore, this change does not involve a significant reduction in a margin of safety.

TECHNICAL SPECIFICATION PAGES WITH PROPOSED CHANGES

The following additional Technical Specifications are affected by this supplemental request.

The markup of page 3/4 0-2a incorporates and supercedes the previously submitted changes to Specification 4.0.3 for clarity, including additional text labeled "Insert 'A'". Text being added is shown in ***bold italics*** on the markup pages.

Salem Unit 1, Facility Operating License DPR-70:

Technical Specification	Page
4.0.1	3/4 0-2a
Bases 4.0.1	B 3/4 0-5

Salem Unit 2, Facility Operating License DPR-75:

Technical Specification	Page
4.0.1	3/4 0-2a
Bases 4.0.1	B 3/4 0-5

APPLICABILITY
SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other *specified* conditions ~~specified for~~ *in the Applicability for* individual Limiting Conditions for Operation, unless otherwise stated in ~~an individual~~ *the* Surveillance Requirement. ***Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the Limiting Condition for Operation.***

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

4.0.3 Failure to perform a Surveillance ~~Requirement~~ within the ***specified frequency*** ~~allowed surveillance interval, defined by Specification 4.0.2,~~ shall ~~constitute a~~ *be* failure to meet the ~~OPERABILITY requirements for a~~ Limiting Condition for Operation, ***except as provided in Specification 4.0.3*** ~~The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowed outage time limits of the ACTION requirements are less than 24 hours.~~ ***If it is discovered that a Surveillance was not performed within its specified frequency, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.***

If the Surveillance is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met and the applicable Actions must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the Limiting Condition for Operation must immediately be declared not met and the applicable Actions must be entered. Surveillance~~s Requirements~~ do not have to be performed on inoperable equipment ***or variables outside specified limits***.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2 and 3 components shall be applicable as follows:

a. Inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).

b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

APPLICABILITY
SURVEILLANCE REQUIREMENTS

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b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

PROPOSED CHANGE TO TS BASES PAGES

Insert D *(Modifies Bases for TS 4.0.1)*

Failure to meet a Surveillance within the specified Frequency, in accordance with Specification 4.0.2, constitutes a failure to meet an LCO.

Systems and components are assumed to be OPERABLE when the associated Surveillance Requirements have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when either:

a. The systems or components are known to be inoperable, although still meeting the Surveillance Requirements, or

b. The requirements of the Surveillance(s) are known to be not met between required Surveillance performances.

Insert E *(Modifies Bases for TS 4.0.1)*

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given Surveillance. In this case, the unplanned event may be credited as fulfilling the performance of the Surveillance Requirement. This allowance includes those Surveillances whose performance is normally precluded in a given OPERATIONAL MODE or other specified condition.

Surveillances, including Surveillances invoked by ACTIONS, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met and performed in accordance with Specification 4.0.2 prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with Specification 4.0.2. Post maintenance testing may not be possible in the current OPERATIONAL MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to an OPERATIONAL MODE or other specified condition where other necessary post maintenance tests can be completed.

Some examples of this process are:

a. Auxiliary Feedwater (AFW) pump turbine maintenance during refueling that requires testing at steam pressures > 680 psig. However, if other appropriate testing is satisfactorily completed, the AFW system can be considered OPERABLE. This allows startup and other necessary testing to proceed until the plant reaches the steam pressure required to perform the testing.

b. High Pressure Safety Injection (HPI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPI considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post maintenance testing.

APPLICABILITY

BASES

Specifications 4.0.1 through 4.0.5 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations, 10 CFR 50.36(c)(3):

"Surveillance requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions of operation will be met."

Specification 4.0.1 establishes the requirement that surveillances must be met ~~performed~~ during the OPERATIONAL MODES or other conditions for which the requirements of the Limiting Conditions for Operation apply unless otherwise ~~stated~~ in an individual Surveillance Requirement. ~~The purpose of~~ this specification is to ensure that surveillances are performed to verify the ~~operational status~~ of systems and components and that ~~parameters~~ are within specified limits ~~to ensure safe operation of the facility when the plant is in a MODE or other specified condition for which the associated Limiting Conditions for Operation are applicable~~. Surveillance ~~Requirements~~ do not have to be performed when the facility is in an OPERATIONAL MODE for which the requirements of the associated Limiting Condition for Operation do not apply, unless otherwise specified. The Surveillance Requirements associated with a Special Test Exception are only applicable when the Special Test Exception is used as an allowable exception to the requirements of a specification.

4.0.2 Specification 4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18 month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that the most probable result of any

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